

MAR 09 1989

Mr. Robert D. Kulick
Acting Area Director
Occupational Safety and Health
Administration
Department of Labor
2 East Blackwell Street
Dover, New Jersey 07801

Dear Mr. Kulick:

I am writing this letter to recommend that an OSHA inspection take place at Central Steel Drum, Inc. ("CSD"). CSD refurbishes drums and is located at 704 Doremus Avenue, in Newark, New Jersey. It employs approximately seventy people.

A number of environmental investigations have been performed at this facility. During the last inspection, an EPA inspector reported that it was likely that the facility was in violation of OSHA regulations. The inspector noted the following:

1. extremely high and possibly hazardous levels of organic vapors in an area in which employees were involved in painting drums;
2. lower levels of organic vapors throughout the building mentioned in paragraph 1;
3. entrapped incinerator fumes in an employee accessible incinerator feed canopy area;
4. no ear protection being worn by employees in areas in which the noise level probably exceeded the level at which OSHA would require protection and monitoring; and
5. unguarded moving parts of machines located throughout the facility.

Please inform me when an inspection of the facility will be conducted. Also, I would appreciate receiving copies of the OSHA inspection report and documentation on the actions taken as a result of such an inspection, should any such action occur.

My staff and myself are available to provide you with any assistance regarding this matter should you have any questions concerning this referral, please feel free to call me at (212) 264-2638.

Sincerely,

Joel Columbek
Chief, New Jersey/Caribbean Compliance Section
U.S. Environmental Protection Agency
26 Federal Plaza
New York, NY 10278

bcc: Jim Sanderson, AWM-HWC
Flaire Mills, ORC-WTS
Ted Gabel, AWM-HWC
John Wilk, AWM-HWC

U. S. Department of Labor - OSHA
2 East Blackwell Street
Dover, N. J. 07801
201-361-4050

Dec 27 1989

Joel Golenbeck
Chief, New Jersey/Carribean Compliance Section
U.S. Environment Protection Agency
26 Federal Plaza
New York, New York 10278

Dear Mr. Golenbeck:

In response to your referral concerning safety and/or health hazards at Central Steel Drum, 704 Doremus Avenue, Newark, New Jersey, the Occupational Safety and Health Administration conducted an inspection there. That inspection was completed on 12/7/89.

The results of our investigation of your complaint items are as follows:

A) Item 1 - "Extremely high and possibly hazardous levels of organic vapors in an area in which employees are involved in painting drums." Employees were exposed to solvents from over spray to spray booths. Sampled the three employees (painters) who worked in spray booth area -(main inner lining, and head spray booths), sampled for Naptha, Methyl Ethyl Ketone, Toluene and Xylene. All results indicated an under exposure to solvents. However, due to improper control of overspray, violations were issued based on improper hygiene practices with spray booths and flammable liquids (See Violations).

B) Item 2 - "Lower levels of organic vapors throughout the building, mentioned in item 1.

Employees in rear of drying ovens, and who work in paint storage area where sampled for solvents (Methyl Ethyl Ketone, Xylene, Toluene and Petroleum Distallates) all results indicated an underexposure to the above mentioned solvents. Solvents were chosen based on Material Safety Data Sheets for paints used in company. Sampling procedures were in accordance with the Industrial Hygiene Technical Manual, and Industrial Hygiene Field Operation Manual.

Jim
Fisher - We
need copy of
citation issued
to ~~XXXX~~ CSD.
Call, a jet
it. I hope
not included
in this letter.
Then copy
from ~~the~~ ~~file~~
Flaine ~~John~~

Item 3 - "Entrapped incinerator fumes in incinerator feed canopy area". Employees were exposed to lead fumes from incinerated lead based paint. Sampling for lead fumes was done on two separate occasions, and in each case the individuals were over exposed to lead fumes. Overexposure to lead fumes led to several violations of the lead (1910.1025) Standards (See Violations).

Item 4 - "No hearing protection was being worn by employees in areas in which the noise level probably exceeded the levels of which OSHA would require protection and monitoring".

Sampled for noise in the following areas, Top Deck, Spray Booth, General Assembly, Head and Drying areas, in all cases, employees were determined to be over the OSHA permissible exposure limit of 90 dBA. Over exposure lead to several violations of 1910.95 Standard, to include not wearing the proper protective equipment when exposed to levels of 90 dBA.

Item 5 - "Unguarded moving parts of machines located throughout the facility".

Upon walk through inspection, CSHO discovered several instances of unguarded chain and sprockets and improperly guarded pedestal grinders. These unguarded circumstances lead to violation of machine guard standard.

Attached for your information is a copy of the OSHA-2, Citation and Notification of Penalty, which was sent to your employer on 12/20/89 and should have been posted at the workplace for at least 3 days after receipt.

If you do not agree with our inspection results, you may contact me for clarification of the matter. You also have the right to an informal review by the OSHA Regional Administrator, who may be contacted at the following location:

Mr. Robert D. Kulick
Area Director
U.S. Department of Labor
Occupational Safety and Health Administration
2 East Blackwell Street
Dover, New Jersey 07801